CGB-CC-0715

Don Russell
D.B.A. Don Russell Productions
3526 Woodmont Park Lane
Louisville KY 40243

JUN 6 2007
FCC-MAILROOM

June 1, 2007

Federal Communications Commission Attention: CGB Room 3-B431 445 12th Street, Southwest Washington D.C. 20554

RE: Request for full and exemption from closed-captioning requirements

Ladies and Gentlemen:

Preliminary Statement

Don Russell. d.b.a. Don Russell Productions, is a company with one employee. Established in 2005 to specifically create videotape and broadcasting an outdoor television shows known as "Inside The Outdoors." These programs are designed to educate viewers about outdoor activities in the city of Louisville.

Each year, twelve (12) shows are taped and broadcast. The past year, 2006, the gross income from these projects, completely from advertising, totaled, \$7,200.00.

The average production cost for these shows was \$6,800.00.

Closed Captioning

The cost of close caption for these shows would cost approximately \$3000.00 which would create a loss on the project.

Company Financial Resources

Cash: \$0

Equipment: \$35,000. Tape Library \$2,000.

I have, and will continue to seek additional advertising revenue, but there is a tremendous amount of competition from local broadcast stations and others.

WMYO 58 television is not willing to cover the cost of closed captioning.

Alternatives To Closed Captioning

I do use maps and large graphics and will continue to do so to assist viewers.

Don Russell, d.b.a. Don Russell Productions, request the commission grant a full exemption of the closed caption requirements because of the undue financial burden it causes.

Thank you for your consideration.

Don Russell

AFFIDAVIT

LOUISVILLE, KENTUCKY

Before me, the undersigned officer, duly authorized under the laws of the Stat of Kentucky to administer oaths, personally appeared Don Russell who, after oath was duly administered, deposes and on oath states the following:

That I am the Don Russell d.b.a. Don Russell Productions and my company handles the television editing and production for "Inside The Outdoors." The current cost per week for production does not include any closed caption. The cost for closed caption will be an addition \$300.00 per broadcast per week for a total additional cost of \$3,000.00 per year.

This the 1st day of June. 2007

Don Russell (sole proprietor)

Sworn to and subscribed before me, this 1st day of June, 2007

Notary Public, State at Large, KY My commission expires June 10, 2010